Bradford J. Sandler (NY Bar No. 4499877) Ilan D. Scharf, Esq. (NY Bar No. 4042107) Jason S. Pomerantz, Esq. (CA Bar No. 157216) PACHULSKI STANG ZIEHL & JONES LLP 780 Third Avenue, 34th Floor New York, New York 10017 Telephone: (212) 561-7700

Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,

Plaintiff,

٧.

TRACELINK INC.,

Defendant.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 2-22-02035 (PRW)

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC ("<u>Plaintiff</u>" or the "<u>RDC Liquidating Trust</u>"), successor in interest to Rochester Drug CoOperative, Inc., and defendant, Tracelink Inc. ("<u>Defendant</u>", and together with Plaintiff, the "<u>Parties</u>"), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the "Complaint") against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022; and WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint. The Parties hereby stipulate and agree to the matters set forth below:

- 1. The time by which Defendant is required to answer the Complaint is extended through and including April 15, 2022.
- Defendant does not challenge personal jurisdiction and waives any objection to service of process of the Summons and Complaint in this adversary proceeding.
 Respectfully submitted,

Dated: February 17, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

SO ORDERED:

Bradford J. Sandler (NY Bar No. 4499877) Ilan D. Scharf (NY Bar No. 4042107) Jason S. Pomerantz (CA Bar No. 157216) 780 Third Avenue, 34th Floor New York, NY 10017 Telephone: (212) 561-7700 Email: bsandler@pszjlaw.com

ischarf@pszjlaw.com jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

Dated: February 22, 2022

GOODWIN PROCTER LLP

Artern Skorostensky (NY Bar No. 5520861)

The New York Times Building

620 Eighth Avenue New York, NY 10018

Telephone: (212) 813-8800

Email: askorostensky@goodwinlaw.com

Counsel to Defendant Tracelink Inc.

DATED:

2022

Rochester, New York

HON, PAUL R. WARREN United States Bankruptcy Judge